

**SUPPRESSED**

**MAY 19 2021**

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

PRINCE VAMBOI,

Defendant.

No.

**4:21CR00323 RLW/SRW**

**INDICTMENT**

The Grand Jury charges:

**COUNTS 1-3**

**Conspiracy to Commit Wire Fraud 18 U.S.C. §1349**

**A. Introduction**

At all times relevant to this indictment:

1. Verona Safety Supply, Inc., located in Madison, Wisconsin, was a safety supply company.
2. Verona Safety Supply, Inc. was part of the Safety Management Group (SMG), a group of business owners and business purchasers who meet and discuss supply and costs of safety merchandise.
3. Between late March 2020, and early April 2020, Verona Safety Supply decided to make a large purchase of N-95 masks to sell to customers.

**B. The Conspiracy to Defraud**

4. Beginning on or about April 1, 2020, and continuing until on or about April 30, 2020, in the Eastern District of Missouri, **PRINCE VAMBOI**, the defendant herein, and other conspirators, both known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate and agree with each other and others known and unknown to the Grand Jury, to commit the following offense against the United States:

a. To devise and intend to devise a scheme to defraud, and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises, and for the purpose of executing the scheme described above, and attempting to do so, to cause to be transmitted by means of wire communication in interstate commerce signals and sounds, in violation of Title 18, United States Code, Section 1343.

5. It was part of the conspiracy to execute a scheme and artifice to defraud that:

a. On or about April 15, 2020, and April 21, 2020, a co-conspirator unknown to the Grand Jury falsely posed as a known member of SMG and contacted employees of Verona Safety Supply via email and telephone, respectively. The co-conspirator indicated that he or she knew of a company that would sell a large quantity of N-95 masks to Verona Safety Supply for a fair price.

b. On or about October 21, 2019, in the Eastern District of Missouri, defendant **PRINCE VAMBOI** ("Defendant") opened the US Bank account number 152320965675 in the name of PJ Logistics, using the alias "Patrick L. Jones."

c. On or about April 15, 2020, a co-conspirator unknown to the Grand Jury sent an email instructing an employee of Verona Safety Supply to wire payment(s) to the PJ Logistics US Bank account number 152320965675 in St. Louis, Missouri, in order to secure the N-95 masks.

d. As further alleged below, between on or about April 7, 2020, and April 20, 2020, acting on the instructions of Defendant's co-conspirator, Verona Safety Supply made payments totaling \$159,000.00, believing that the payments were being made to secure shipments of N-95 masks.

e. Defendant and his co-conspirators never shipped any N-95 masks to Verona Safety Supply.

**C. The Wire Transmission**

The allegations contained in paragraphs 1-5 are hereby realleged and incorporated by reference herein:

**COUNTS 1 -3**

6. On or about the dates listed below, in the Eastern District of Missouri, the defendant,

**PRINCE VAMBOI,**

for the purpose of executing the above-described scheme to defraud, did knowingly cause to be transmitted, by means of wire communication in and affecting interstate commerce, certain writings, signs, signals, pictures, and sounds, that being, wire funds transfers and an electronic funds transfer in the amounts listed below, from Oak Bank in Fitchburg, Wisconsin, to US Bank in St. Louis, Missouri:

Count	Date	Transfer Type	Amount
1	April 7, 2020	Electronic Funds Transfer	\$15,900.00
2	April 17, 2020	Wire Transfer	\$63,600.00
3	April 20, 2020	Wire Transfer	\$79,500.00

All in violation of Title 18, United States Code, Section 1349.

**COUNT 4**  
**Bank Fraud 18 U.S.C. §1344**

**A. Introduction**

7. At all times relevant to the Indictment, the financial institutions listed in the tables below, in Paragraphs 14 and 15, were all financial institutions within the meaning of 18 U.S.C. § 20 and were insured through the Federal Deposit Insurance Corporation.

8. At all times relevant to the Indictment, defendant **PRINCE VAMBOI** was a citizen of Sierra Leone and was a resident of St. Louis in the Eastern District of Missouri.

9. At no time relevant to the Indictment has Defendant lawfully been issued a legitimate South African passport.

**B. The Scheme to Defraud**

10. Beginning on or about October 1, 2019, in the Eastern District of Missouri, the defendant, **PRINCE VAMBOI**, aided and abetted by individuals known and unknown to the Grand Jury, devised a scheme and artifice to obtain moneys, funds, and assets owned by and under the

custody and control of federally insured financial institutions by means of false and fraudulent pretenses and representations.

**C. Manner and Means**

The Scheme and artifice to defraud was in substance as follows:

11. Beginning in 2019, Defendant began opening bank accounts with fraudulent, false identities in order to facilitate his roles as a money courier for individuals engaged in fraud schemes.

12. It was further part of the scheme and artifice to defraud that the proceeds deposited by Defendant included those obtained from multiple different fraud schemes, including (a) check counterfeiting, whereby Defendant deposited a check stolen from the United States Mails and subsequently counterfeited; (b) the proceeds of the wire fraud scheme alleged in Counts 1-3; (c) fraudulently obtained unemployment insurance benefits.

13. It was further part of the scheme to defraud that once Defendant received the proceeds of various fraud schemes, he subsequently transferred those funds to confederates or withdrew the proceeds in cash.

14. It was further part of the scheme to defraud that on or about the dates listed below, Defendant opened various bank accounts, enumerated below, under the name of Dennis K. King, d.b.a. DK King Enterprise, using a counterfeit United States Visa:

<b>Date</b>	<b>Bank</b>	<b>Account Number</b>
January 3, 2019	US Bank	152320155137

January 24, 2019	Commerce Bank	131090477
January 31, 2019	Bank of America	3540 1247 9456
February 8, 2019	Wells Fargo Bank	2390817548
February 8, 2019	SunTrust Bank	1000246885023

15. It was further part of the scheme to defraud that on or about the dates listed below, Defendant opened various bank accounts, enumerated below, under the name of Patrick Jones, d.b.a. PJ Logistics or MaxGen Media Service, using a counterfeit United States Visa:

Date	Bank	Account Number
October 21, 2019	US Bank	152320965675
January 8, 2020	Great Southern Bank	5570810146
March 6, 2020	Citizens National Bank	945437201

16. On or about June 24, 2019, in the Eastern District of Missouri, the defendant,

**PRINCE VAMBOI,**

aided and abetted by persons known and unknown to the Grand Jury, did knowingly execute a scheme and artifice to obtain the money, funds, or other property owned by or under the control of Wells Fargo by means of material false or fraudulent pretenses, representations or promises, in that **PRINCE VAMBOI** did deposit a counterfeit check that had been fraudulently altered to reflect D.K. King Enterprise as the payee, drafted in the amount of \$35,098.66, and drawn on the Wells Fargo bank account of "F.C.," into his Commerce Bank account, knowing that D.K. King



Enterprise was not a legitimate recipient of those funds and had no authorized or legal purpose for accepting funds drawn on the account of F.C., all without the knowledge or consent of F.C.

In violation of Title 18, United States Code, Sections 1344.

**COUNT 5**  
**Misuse of Visa 18 U.S.C. §1546(a)**

On or about January 24, 2019, in the Eastern District of Missouri, the defendant,

**PRINCE VAMBOI,**

did knowingly use an immigrant visa, in the name Dennis Kenzo King, which the Defendant knew to be forged, counterfeited, altered, and falsely made, in that the Defendant presented the counterfeit United States Visa to Commerce Bank as identification in order to open an account.

In violation of Title 18, United States Code, Section 1546(a).

**FORFEITURE ALLEGATION**

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Sections 981(a)(1)(C) and Title 28, United States Code, Section 2461, upon conviction of an offense in violation of Title 18, United States Code, Section 1349 or 1344 as set forth in Counts 1 through 4, the defendant shall forfeit to the United States of America any property, real or personal, which constitutes or is derived from proceeds traceable to said violation.
2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to said offenses.

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

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FOREPERSON

SAYLER A. FLEMING,  
United States Attorney

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DIANE E.H. KLOCKE, #61670MO  
Special Assistant United States Attorney